

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker

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**STIPULATION BY AND BETWEEN THE CITY OF DETROIT,
MICHIGAN AND ADP, LLC (F/K/A ADP, INC.) FOR AN ORDER
APPROVING AN EXTENSION OF THE DEADLINE TO OBJECT TO THE
ADMINISTRATIVE EXPENSE CLAIM FILED BY ADP, INC.**

The City of Detroit, Michigan (“City”) and ADP, LLC (f/k/a ADP, Inc.) (“ADP”, and together with the City, the “Parties”), file this Stipulation by and Between the City of Detroit, Michigan and ADP, LLC (f/k/a ADP, Inc.) For an Order Approving an Extension of the Deadline To Object To The Administrative Expense Claim Filed by ADP.

WHEREAS, on February 18, 2013, ADP filed a proof of claim asserting a general unsecured rejection damages claim in the amount of \$29,644,827.50 (“Unsecured Rejection Claim”) and an administrative expense claim in the amount of \$949,541.17 under Bankruptcy Code § 503(b) (“Administrative Claim”) (Cl. No. 1062).

WHEREAS, the City's deadline to file an objection to the Unsecured Rejection Claim is December 7, 2015. Doc. No. 9749.

WHEREAS, the Court previously extended the City's deadline to file an objection to the Administrative Claim through and including June 30, 2015. Doc. No. 9870.

WHEREAS, the Parties request that this Court further extend the deadline for the City to file an objection to the Administrative Claim through and including August 4, 2015.

NOW, THEREFORE, the Parties stipulate and agree as follows:

1. The City's deadline to file an objection to the Administrative Claim is extended through and including August 4, 2015.

STIPULATED AND AGREED:

<p>ATTORNEYS FOR THE CITY</p> <p>By: <u>/s/ Marc N. Swanson</u> Stephen S. LaPlante (P48063) Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 laplante@millercanfield.com swansonm@millercanfield.com</p> <p>-and-</p> <p>Charles N. Raimi (P29746) Deputy Corporation Counsel City of Detroit Law Department 2 Woodward Avenue, Suite 500 Coleman A. Young Municipal Center Detroit, Michigan 48226 Telephone: (313) 237-5037 Facsimile: (313) 224-5505 raimic@detroitmi.gov</p>	<p>ATTORNEYS FOR ADP, LLC (f/k/a ADP, INC.)</p> <p>By: <u>/s/ Judith Greenstone Miller</u> Judith Greenstone Miller (P29208) Jay L. Welford (P34471) JAFFE RAITT HEUER & WEISS, P.C. 27777 Franklin Road, Suite 2500 Southfield, MI 48034 Telephone: (248) 351-3000 Facsimile: (248) 351-3082 jmiller@jaffelaw.com jwelford@jaffelaw.com</p>
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DATED: June 24, 2015

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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In re	:	Chapter 9
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CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Thomas J. Tucker

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**ORDER GRANTING STIPULATION BY AND BETWEEN THE CITY OF
DETROIT, MICHIGAN AND ADP, LLC (F/K/A ADP, INC.) FOR AN
ORDER APPROVING AN EXTENSION OF THE DEADLINE TO OBJECT
TO THE ADMINISTRATIVE EXPENSE CLAIM FILED BY ADP, INC.**

Upon the Stipulation filed by the City of Detroit, Michigan (“City”) and
ADP, LLC (f/k/a ADP, Inc.) (“ADP”) for an Order Approving an Extension of the
Deadline to Object to the Administrative Expense Claim Filed by ADP
(“Stipulation”) ; and the Court being otherwise advised in the premises;

IT IS ORDERED THAT:

1. The City’s deadline to file an objection to the Administrative Claim¹
filed by ADP is extended through and including August 4, 2015.

¹ Capitalized terms not otherwise defined in this Order shall have the meanings
given to them in the Stipulation.